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DOC #: _____
DATE FILED: 5/10/2023

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: Search Warrant Dated
November 5, 2021

Case No.: 21 Misc. 813 (AT)

In re Search Warrant Dated
November 3, 2021

Case No.: 21 Misc. 819 (AT)

In re Search Warrant Dated
November 3, 2021

Case No.: 21 Misc. 825 (AT)

**PETITIONERS' MOTION
FOR LEAVE TO FILE UNDER SEAL**


On behalf of all Petitioners, Petitioner Project Veritas respectfully moves for leave to file under seal, pursuant to Rule IV(A) of the Court's Individual Practice Rules, Petitioners' Non-Public Objections to the Special Master's Report and Recommendation. The Non-Public Objections discuss specific documents addressed by the Report and Recommendation that have not been disclosed to the Government's Investigative Team due to claims of privilege under the First Amendment, the Journalistic Privilege and Attorney-Client Privilege. Petitioners' Public Objections will be publicly filed and discuss the law and facts without revealing the contents of documents for which privilege is in dispute.

In accordance with this Court's Rule, Petitioner Project Veritas, Inc., therefore seeks on its own behalf and on behalf of all Petitioners leave to submit the Non-Public Objections under seal.

GRANTED.

SO ORDERED.

Dated: May 10, 2023
New York, New York



ANALISA TORRES
United States District Judge